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proffers

1 message

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Fri, Apr 4, 2025 at 8:54 PM

To: Daniel Richenthal <Daniel.Richenthal@usdoj.gov>, Paul Monteleoni <Paul.Monteleoni@usdoj.gov>, Lara Pomerantz

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Hello all, additional supplemental defense witness proffers below. Best, Barry

Jamela Maali: Would testify about her experience working with Fred Daibes, her knowledge of gift giving from Mr. Daibes to Nadine Menendez, and his reputation for gift giving. She would further testify about a handbag purchased by Mr. Daibes for Ms. Menendez as a gift in or around spring of 2022. She would describe the handbag, recount how Ms. Menendez became interested in the bag, and Mr. Daibes reaction. She would further testify about her understanding of how Mr. Daibes purchased the bag and gave it to Ms. Menendez. Additionally, Ms. Maali would testify about her knowledge of Mr. Daibes' interest in owning Ms. Menendez's home. She would further testify about Ms. Menendez's interest in looking to purchase a new home in early 2022. She would describe her involvement connecting Ms. Menendez with a realtor and her understanding of the actions Ms. Menendez took with respect to the realtor and her search for a home.

Carolina Silvarredonda: Would testify that she began working for IS EG Halal in Uruguay around September 2019. She would testify about her experience working at IS EG Halal in 2019. More specifically, she would testify about her experience working with Nadine Menendez with respect to IS EG Halal. Ms. Silvarredonda would testify about her knowledge of the work Ms. Menendez was expected to complete for IS EG Halal, including establishing an office for IS EG Halal in India. She would further testify about the work actually performed by Ms. Menendez to establish an office in India and her experience working with Ms. Menendez to complete such work. Ms. Silvarredonda would further testify about her satisfaction with the work performed by Ms. Menendez and she would testify about her understanding of Mr. Hana's satisfaction of the work performed. Additionally, she would testify about her knowledge of the termination of Ms. Menendez's work with IS EG Halal.

John Moldovan: Would expand upon his testimony during the government's case, including all of the substance of his testimony in Trial 1. More specifically, his testimony would include his understanding of the initial terms he understood Mr. Hana to be expecting in relation to the promissory note for the mortgage loan, namely that the loan would need to be paid back in full in five years, it would not accrue interest, and it would not have a payment schedule. He would further testify about the investments he received from Mr. Hana and Mr. Daibes relating to his law firm.

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